

MEMO ENDORSED

Federal Defenders  
OF NEW YORK, INC.

Southern District  
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June 15, 2021

**By ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
New York, NY 10007

USDC SDNY  
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DATE FILED: **6-21-21**

**Re: United States v. Douglas Waterman, 21 Cr. 228 (ALC)**

Honorable Judge Carter:

I write on behalf of the parties and at the direction of the Court to provide a joint status report regarding the above-captioned matter.

The parties appeared before the Court for an initial conference on April 15, 2021. Shortly thereafter, the Government produced Rule 16 materials, amounting to over 100 Gigabytes of electronic files. The defense continues to review these materials but requires additional time to complete its review and to consult with Mr. Waterman.

Accordingly, the Defense respectfully requests that this matter be adjourned for not less than 45 days. I have discussed this matter with Assistant United States Attorney Kimberly Ravener, who consents to the requested adjournment on behalf of the Government provided that the time between June 15, 2021 and the adjourn date be excluded from calculation under the Speedy Trial Act. The Government submits that the ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial, because the requested adjournment would permit the defense additional time to review discovery and to consult with the defendant. See 18 U.S.C. § 3161(h)(7). The defense consents to the Government's Speedy Trial Act application.

Respectfully submitted,

/s/ Christopher A. Flood  
Christopher A. Flood  
Assistant Federal Defender

cc: Kimberly Ravener  
Assistant United States Attorney  
(by ECF)

The application is granted. Joint  
status report due 7-30-21. Time excluded.  
So Ordered.  
*Andrew L. Carter*  
6-15-21